
To: Amí Hafkemeyer / Energy Facility Site Evaluation Council
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Alicia Schulz / Washington Department of Ecology

Date: June 16, 2023

Subject: Badger Mountain Solar Energy Project: Data Request 3 Response – Wetlands and Waters

On behalf of Aurora Solar, LLC (Applicant), this memorandum provides responses to the Energy Facility Site Evaluation Council (EFSEC) letter sent on May 11, 2023 regarding additional information requested about wetlands and waters for the Badger Mountain Solar Energy Project (Project).

Requests and corresponding responses are provided below:

1. *Provide all additional USACE Wetland Determination Data Forms for sample plots that were collected in the Project Area but not included with the submitted wetland delineation report.*
2. *Provide maps showing the locations of the additional sample plots not included with the wetland delineation report.*

Response: In response to items 1 and 2, Figure 1 shows the locations of additional sample points that were collected in the Project Area and Attachment A provides the data sheets for each sample point.

3. *Provide the preliminary jurisdictional determination Avangrid received from USACE for the project.*

Response: Following a call with Brad Johnson at the U.S. Army Corps of Engineers on December 9, 2022, and at the USACE's recommendation, the Applicant agreed to accept a Preliminary Jurisdictional Determination (PJD) for aquatic resources within the Project area and is filing a request for the PJD.

4. *4. Perform a desktop delineation of offsite wetlands outside of the Project Area that may have buffers extending into the Project Area. Include completed Ecology rating forms for these wetlands and the corresponding buffer widths. Please submit this in the form of a:*
 - *A memo summarizing methods used for the desktop delineation.*
 - *Map(s) of the offsite wetlands and their corresponding buffers.*
 - *And an Ecology rating form for each wetland.*

Response: In response to item 4, Figure 1 shows the location of the potential wetland within a conservative 300-foot buffer of the Project boundary, data sheets for sample points WT-100 and WT-

101 are included in Attachment A, and the estimated Eastern Washington Wetland Rating Summary (Hruby 2014) form for the potential wetland is provided in Attachment B.

A summary of the desktop delineation for the potential wetland included:

- Drawing a conservative 300-foot buffer around the Project Area boundary at the request of EFSEC and the Washington Department of Ecology.
- Analyzing the 300-foot buffer for any signs of water inundation or pooling within the growing season in the historical orthoimagery.

NHD and NWI locations within the buffer are classified as waterways (R3UBH) without wetland characteristics. There is one location near sample points WT-100 and WT-101 where surveyors did observe some cattails during the growing season outside of the Project area boundary. That desktop delineated wetland is buffered and shown on the attached Figure 1.

FIGURE

ATTACHMENT A

ATTACHMENT B